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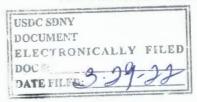
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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF THE KINGDOM OF DENMARK (SKATTEFORVALTNINGEN) TAX REFUND SCHEME LITIGATION

This document relates to case no. 18-cv-09507.



MASTER DOCKET 18-md-2865 (LAK)

[PROPOSED] CONSENT JUDGMENT

WHEREAS, on June 14, 2018, plaintiff Skatteforvaltningen ("SKAT")

commenced this action against defendants Central Technologies Pensions Group Trust ("Central Technologies"), Bluegrass Investment Management, LLC ("BGIM"), and Bernard Tew, and on April 24, 2020, SKAT filed an amended complaint against the defendants (the foregoing collectively hereinafter referred to as the "Action");

WHEREAS, SKAT and defendant BGIM now wish to resolve all the claims SKAT asserted in the Action against BGIM;

NOW THEREFORE, without trial or adjudication of issue of fact or law, and upon BGIM's consent, the Court finds that there is good and sufficient cause to enter this Consent Judgment, and that IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED THAT:

- This Consent Judgment is hereby entered in favor of plaintiff SKAT against defendant BGIM in the amount of \$6,969,000 (US); and
 - 2. Defendant BGIM shall be liable to pay the amount set forth in paragraph 1.
 - 3. Each party shall bear its own attorneys' fees and costs.

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IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Consent Judgment.

Dated: New York, New York June >, 2021

Bv:

HUGHES HUBBARD & REED LLP

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New York, New York 10004-1482

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Counsel for Plaintiff Skatteforvaltningen (Customs and Tax Administration of the Kingdom of Denmark)

SO ORDERED:

Lewis A. Kaplan United Stated District Judge By: _____

SEWARD & KISSEL LLP

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Counsel for Bluegrass Investment Management, LLC

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Dated: New York, New York June2021	1
Ву:	By: Mare J. Hy
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Counsel for Plaintiff Skatteforvaltningen (Customs and Tax Administration of the

Kingdom of Denmark)

United Stated District Judge

SO ORDER

Lewis A. Kaplan

Counsel for Bluegrass Investment Management, LLC